

**CONSISTENCY ACROSS INVESTIGATORY NOTES, INVESTIGATORY MEMORANDA
AND ALLEGATIONS OF THE COMPLAINT**

CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW1	Peggy Burns	¶44: According to CW1, the ratings for projects were based on objective criteria, the project rating status was established by the main Lockheed Martin headquarters, and every IS&GS project was evaluated on a monthly basis. The project evaluations were conducted by the program managers for each project and the stoplight status was loaded into a “dashboard” system that was hosted on Lockheed Martin’s intranet. CW1 stated that Defendant Gooden reported the status of IS&GS projects to			

¹ For Burns, all citations are to Ex. 24 (Burns Mem.). For Hawn, all citations are to Ex. 26 (Hawn Mem.). For Morrison, all citations are to Ex. 30 (Morrison Mem.). For Asbury, all citations are to Ex. 32 (Asbury Mem.). For Nimmons, all citations are to Ex. 34 (Nimmons Mem.). Because Parsons confirmed the vast majority of the information attributed to him in the Complaint, his inclusion would be duplicative and is therefore not reflected herein.

² For Burns, all citations are to Ex. 25 (Burns Notes 9/13). For Hawn, all citations are to Ex. 27 (Hawn Notes 9/29). For Morrison, all citations are to Ex. 31 (Morrison Notes 9/19). For Asbury, all citations are to Ex. 33 (Asbury Notes 9/22). For Nimmons, all citations are to Ex. 35 (Nimmons Notes 9/27).

³ All citations are to Ex. 22 (Keatly Dep.).

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
		Lockheed Martin's other senior executives.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW1	Peggy Burns	¶48: CW1 stated that the Sentinel Program had problems because it had been priced at a very low rate.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW1	Peggy Burns	¶49: According to CW1, the TSA was not satisfied with the work performed by			

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		Lockheed Martin.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶24: CW2 worked as a Business Area Manager in the IS&GS Civil Segment of Lockheed Martin during the Class Period and served in the defense/government contracting field for 30 years. CW2 had regular interactions with Defendant Gooden and other Business Area Managers.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶35: It was clear by the end of 2008 and early 2009 that 2009 was going to be a very difficult year for IS&GS and that financial goals for IS&GS for 2009 could not be achieved. CW2 maintained reports of the			

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		performance of his/her area of IS&GS compared with the projections that showed that the goals were not being achieved and could not be achieved.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶36: CW2 and CW3, a VP of Strategic Development in IS&GS, also stated that Defendant Gooden was told at the beginning of 2009 that the projections for 2009 for IS&GS were overstated. According to CW2, while Lockheed Martin knew that the goals for IS&GS couldn't be achieved, shareholders did not know this information. According to CW2, Defendants Stevens and Tanner received information about IS&GS directly from Defendant Gooden and Gooden's finance manager, Jeff MacLuachlan.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶38: According to CW2, Lockheed Martin deliberately underbid on programs and knew that it could not perform the work on many programs without large cost overruns.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶43: According to CW2, due to cost cutting in 2008, IS&GS primarily had "low" paid personnel assigned to programs, which negatively impacted execution, performance and customer satisfaction. This, in turn, resulted in fewer contract wins for Lockheed Martin during 2009.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶48: According to CW2, the Sentinel Program was placed into Red status by early 2009 and problems with the Sentinel Program were caused in part by the inexperience of IS&GS personnel assigned to the program.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶52: According to CW2, the Mission Integration and Development ("MIND") program and GeoScout program initiated by the National Geospatial-Intelligence Agency, were two IS&GS Intelligence Segment programs that experienced problems in early 2009. Lockheed Martin was a subcontractor to Raytheon for the MIND program. In both the first and second quarters of 2009,			

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		the MIND program had been reduced in scope and value ("de-scoped") because of Lockheed Martin's poor performance.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶53: Beginning in 2007, the main Lockheed Martin corporate office began closely monitoring troubled IS&GS programs. According to CW2, there were monthly corporate review meetings where the troubled status of programs like the Sentinel Program, GeoScout, MIND, and HR Access were discussed. CW2, who participated in these corporate review meetings, stated that among the issues discussed was the			

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		<p>impact that troubled programs would have on quarterly and year-end financial results.</p>			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶55: During 2Q09, IS&GS also experienced problems with projects for the U.S. Department of State and experienced delays in getting funded because of staffing issues. According to CW2, delays in funding were due in part to inexperienced personnel at Lockheed Martin and the Department of State.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶56: There was a systematic procedure for Lockheed Martin to obtain funding for projects for the Department of State. Before Lockheed Martin could bill the costs to the Department of State and generate fees, the Department of State was required to submit a request to receive funds for the project. The funding request process typically took between 45-60 days. As of 2Q09, Lockheed Martin had already incurred costs on programs for the Department of State, but the funding requests had not yet been			

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		<p>submitted. CW2 stated that it was clear that the inexperienced personnel at the Department of State were unfamiliar with the funding submittal process and did not know how to submit a funding request. According to CW2, Lockheed Martin had forecasted revenues associated with Department of State projects for 2Q09, even though there was no way for revenues to be generated that quarter because funding requests had not been submitted in time. Lockheed Martin knew during the Class Period that these projects would not get funded during 2Q09.</p>			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW2	Pamela Hawn	¶65: [D]uring March 2009 (before the start of the Class			

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		<p>Period), Defendant Gooden approached CW2 and pressured CW2 to represent that his/her area in IS&GS had \$2.5 billion in backlog for 2009. CW2 told Defendant Gooden and others that worked with Gooden that \$2.5 billion in backlog was not reasonable. Defendant Gooden, with the assistance of others, ignored CW2's backlog report and changed the backlog figures to reflect a figure much higher than the backlog computed by CW2. According to CW2, Defendant Gooden grossly overstated the actual backlog for IS&GS.</p>			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW4	Victor Morrison	¶39: CW4 stated that Defendant Gooden, along with VP of Business Development, Tom Oles, were directly responsible for the strategy of underbidding on programs. CW4 also stated IS&GS was focused on cash flow instead of profitability and that IS&GS deliberately understated the cost of labor required for programs. CW4 added that IS&GS often fired employees in order to reduce labor costs. This, however, resulted in inexperienced workers being assigned to projects, which caused various execution problems.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW4	Victor Morrison	¶48: Defendant Gooden was kept apprised of developments about the Sentinel Program and participated in regular conference calls with CW4 and others to discuss this program.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW4	Victor Morrison	¶51: CW4 learned in the first and second quarters of 2009 about significant problems with four large IS&GS programs, including a contract with the Veterans Affairs and Federal Reserve			

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		in Cleveland, OH, the Sentinel Program, HR Access for the TSA, and a help desk program for the National Aeronautics and Space Administration.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW5	Ken Asbury	¶35: . . . [T]he financial projections for IS&GS's 2009 performance, which were formulated during			

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		<p>2008, were arbitrary. CW5 stated that projections for IS&GS for 2009 were set from the top down as opposed to being based on reasonable estimates from IS&GS's division leaders.</p>			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW5	Ken Asbury	¶36: In February 2009, it was clear to CW5 and other IS&GS division leaders that the full year 2009 projections for IS&GS could not be achieved and CW5			

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		and other division leaders told this to Defendant Gooden at that time.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW5	Ken Asbury	¶45: According to CW3 and CW5, Lockheed Martin held weekly Tuesday telephone conference calls referred to as Red Program Review Meetings during which each IS&GS program classified as Red was discussed.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW5	Ken Asbury	¶49: CW5 stated that HR Access was placed in Red status during the Class Period.			

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CW#	Name	Allegation	Keatly Investigation Memo	Keatly Interview Notes	Keatly Testimony
CW6	Karen Nimmons	¶52: According to CW6, both the GeoScout and MIND programs encountered significant problems during 2009 and			

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		GeoScout also encountered problems during 2008.			

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